

### **REMARKS**

Reconsideration of this application is respectfully requested.

Upon entry of the foregoing amendments, claims 34-109 are pending in this application with claims 34, 35, 43, 44, 52, 53, 61, and 62 being the independent claims. New claims 94-109 have been added.

Based on the above Amendment and the following Remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

The Office Action on page 2, in section 4, objects to claim 50 because of an informality. Claim 50 has been amended to remove the noted informality. Accordingly, Applicant respectfully requests that this objection be withdrawn.

The Office Action on pages 2-7, in sections 5-6, rejects claims 34, 64, 66, 67, 90, and 91 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,875,249 to Mintzer et al. in view of U.S. Patent No. 6,504,941 to Wong. Applicant respectfully traverses this rejection because neither Mintzer nor Wong, alone or in combination, teach the recited features of claims 34, 64, 66, 67, 90, and 91.

Independent Claim 34 recites an image processing system comprising an image providing system that defines "a location information indicating a plurality of regions in image data for embedding a digital watermark *in a desired region among the plurality of regions*." Referring to Figure 25 of the present application, for example, in an exemplary embodiment of the invention, necessary specific information is dispersed in a document, and a digital watermark may be embedded in the part of the necessary specific information. Specification, page 57, lines 21-25. That is, location information (See, e.g., Figure 26 of the present application), which shows the region where necessary specific information exists, is defined beforehand for the image in which the necessary specific information is dispersed. The digital watermark may then be embedded and

extracted from the regions where the necessary specific information is located based on this definition. Therefore, the recited digital watermark does not have to be embedded in unnecessary information, but is instead embedded "*in a desired region among the plurality of regions.*"

The Office Action, on page 3, acknowledges that Mintzer does not teach or suggest "a location information indicating a plurality of regions in image data for embedding a digital watermark *in a desired region among the plurality of regions.*" Wong does not cure this deficiency. Instead, Wong teaches stamping the watermark onto the entire area of the image. Wong, col. 4, lines 20-22. Specifically, Wong teaches forming a watermarked image **of the same size** as the image. The Office Action, on page 14, asserts that Wong teaches inserting the watermark into "partitioned blocks," and that the "partitioned blocks" have the same meaning as the recited "plurality of regions." See, Wong, col. 5, line 12 to col. 6, line 13. However, in this example as cited in the Office Action, the watermark "a" is  $m \times n$  pixels, the image "X" is  $m \times n$  pixels, and the transformed image "b" (i.e. the image X with watermark a embedded in it) is also  $m \times n$  pixels. See, Wong, col. 5, lines 35-56. Accordingly, Wong teaches a watermark that is embedded in the entire image, and not *in a desired region among the plurality of regions*. The fact that Wong partitions the original image into blocks of  $I \times J$  pixels is irrelevant because Wong does not teach embedding the watermark into a desired partition block of the plurality of partition blocks. See, Wong, col. 5, lines 22-33. Rather, quite clearly, Wong teaches an  $m \times n$  pixel watermark that is embedded into an  $m \times n$  pixel image. See, Wong, col 4, lines 20-22; col. 5, line 12 to col. 6, line 13. Therefore, even if one skilled in the art were to combine these references, such a combination would not result in the invention as claimed in claim 34 because neither Mintzer nor Wong teach or suggest embedding a digital watermark *in a desired region among the plurality of regions*. Hence claim 34 is allowable over the cited combination of Mintzer and Wong.

Claims 64, 66, 67, 90, and 91 contain similar recitations as claim 34 and are allowable for similar reason, as discussed above with respect to claim 34. Applicant therefore respectfully requests that this rejection be withdrawn.

The Office Action on pages 7-13, in section 7, rejects claims 35-63, 65, 68-91, 92 and 93 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,875,249 to Mintzer et al. in view of U.S. Patent No. 6,504,941 to Wong and in further view of U.S. Patent No. 6,233,684 to Stefik. Applicant respectfully traverses this rejection.

Claims 35-63, 65, 68-91, 92 and 93 contains similar recitations as claim 34. As discussed above, neither Mintzer nor Wong teach or suggest embedding a digital watermark *in a desired region among the plurality of regions*. Stefik does not cure this deficiency. Instead, Stefik teaches watermarking digital works to reduce the risk of copying the digital works. See, Stefik, col. 5, lines 11-18. Further, Stefik in no way teaches or suggests, embedding a digital watermark "*in a desired region among the plurality of regions*." Accordingly, claims 35-63, 65, 68-91, 92 and 93 are allowable over the three-way combination of Mintzer, Wong, and Stefik. Applicant therefore requests that this rejection be withdrawn.

### CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

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Respectfully submitted,

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